

STATEMENT OF BASIS

**Commercial Jet, Inc.
Dothan, Alabama
Dale County
Facility Number 604-0027**

Introduction

On June 21, 2018, the Department received an application to renew the Title V Major Source Operating Permit for the Commercial Jet facility at the Dothan Airport. This facility repairs jet aircraft and converts aircraft from passenger to cargo work. The proposed Title V Major Source Operating Permit may be issued under provisions of ADEM Admin. Code R. 335-3-16. The applicant has requested authorization to operate the facility shown on the application on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of the permit.

Background

Commercial Jet does major repairs, including installing cargo doors on older jets, which are used to carry large cargo containers. Some paints and cleaning solvents will be applied by brush and cloth in all of the buildings at this facility. The largest source of air emissions at this facility is the main paint Hanger. Solvents will also be used to remove old paint in this building. Most of these solvents contain few Hazardous Air Pollutants or Volatile Organic Compounds. Natural gas is used to heat the Hangers.

Emission Units

Potential air emissions from this facility are estimated to be 102 tons VOC, 51 tons NO_x, 9 tons CO, and 8 tons of manganese compounds, 69,000 tons of CO₂, and 5 tons of lead compounds each year. Emissions will be estimated from material usage. Aircraft repair is not a listed source under ADEM Code R. 335-3-14-.04(2)(a)1. Therefore, this is not a major source for PSD because potential emissions are less than 250 tons per year for all regulated NSR pollutants. The CO₂ emissions are from the combustion of natural gas to heat Hangers. Air emissions of other Green House Gasses are expected to be trivial. The following is a list of all of the facility's sources that will be part of the Title V Major Source Operating Permit:

<u>Permit Unit Number</u>	<u>Description of Unit</u>
001	Sheet Metal Shop
002	General Maintenance Areas
003	Aircraft Painting/Stripping & Washing
004	Composite Shop
005	RICE

Sheet Metal Shop

The Sheet Metal Shop will be in Hanger One. In this area, aluminum sheets are sheered, milled, and drilled to the required shape before being cleaned, and painted. Bench scale stripping, cleaning and painting will be done in this area. Alodine will be used for chromate conversion. VOC and HAP emissions from this area are expected to be less than one ton per year. The

painting, cleaning, and chemical milling done in this area will be subject to 40 CFR 63 subpart GG.

General Maintenance Areas

General repair work is done in Hangers 2, 6, 7, 8, and 15. This work may include stripping, cleaning, priming, and painting of aircraft components. The amount of chemicals used in these Hangers is expected to be small. Chemical usage will be used to determine the air emissions from this facility. Potential emissions from the general rework operations are estimated to be 9 tons of VOC, 1 ton of glycol ethers, and 1 ton of methyl ethyl ketone in any twelve-month period. The painting done in areas other than Hanger 12 is expected to be applied by brush. The painting, cleaning, and chemical milling operations in all Hangers will be subject to 40 CFR 63 subpart GG.

Aircraft Painting/Stripping & Washing

Hanger 12 will be used for washing, stripping, and painting. Spray painting will be done in this area with High Volume Low Pressure guns. Chromate conversion may also be done in this area. The primary chemical used for paint removal is benzyl alcohol, a VOC. Potential air emissions from this area are estimated to be 11 tons of VOC in any twelve-month period. The operation in this Hanger will be subject to 40 CFR 63 subpart GG.

Composite Shop

Hanger 14 will be used to repair fiberglass and other composite components. Potential air emissions from this work are estimated to be less than one ton per year of VOC. The painting, cleaning, and stripping operations in this area will be subject to 40 CFR 63 subpart GG.

Emission Limits and Proposed Periodic Monitoring

The only emissions controls used at this facility are particulate filters on the paint and sanding booths. Organic HAP emissions from primers shall be limited to no more than 540 g/L of primer as applied for general aviation rework facilities, or 650 g/L of exterior primer to large commercial aircraft, or 350 g/L of primer. VOC emissions from primers shall be limited to no more than 540 g/L of primer for general aviation rework, or 650 g/L of exterior primer to large commercial aircraft, or 350 g/L of primer. These limits are found in 40 CFR 63.745. Compliance will be reported to the Department every quarter.

RICE

This facility has stationary diesel engines. These include two fire pumps and three emergency generators. These units will be subject to 40 CFR 63 subpart ZZZZ (ADEM Code R. 335-3-11-.06(103)) and the opacity limits of ADEM Code R. 335-3-4-.01. The units will be monitored when they are tested, and the results kept with the maintenance records. Fire pump 1 and the Hanger 6 emergency generator are subject to 40 CFR 60 subpart IIII (ADEM Code R. 335-3-10-.03(87)).

CAM

Compliance Assurance Monitoring, 40 CFR part 64, does not apply because a device is not used to control the VOC and HAP emissions from this facility.

Recommendation

I recommend issuing the draft permit following the required public comment and EPA review period. The new RICE units in Air Permit 604-0027-X002 are included in this MSOP. No other changes were in the application to renew this permit.